

John M. Meyer  
Chief Executive Officer

July 1, 2005

Docket No. 05-015-1  
Regulatory Analysis and Development  
PPD, APHIS, Station 3C71  
4700 River Road; Unit 118  
Riverdale, MD 20737-1238

Comments - U.S. Department of Agriculture Docket No. 05-015-1

The Holstein Association USA, Inc. is comprised of over 25,000 members/dairy producers from across the United States. The Association is governed by producers, and works for producers and is the largest dairy breed association in the world.

The Holstein Association has been a leader in animal identification for over 100 years. We have championed the cause of a national mandatory animal ID program in the U.S. for the last four years.

In 1999, National FAIR (Farm Animal Identification and Records) Program was established as a partnership between this organization and USDA-APHIS. This public/private partnership addresses producer concerns regarding cost control and confidentiality. A CD demonstrating this program is enclosed herewith.

We have established a system that could be used as a national program for identifying animals from birth to slaughter that is up and running each and every day in this country. A national animal identification program is needed for animal disease management, trace back, and trace forward purposes to limit exposure and to help keep our domestic and international beef and dairy markets open.

We strongly believe that radio frequency identification (RFID) ear tags should be used for all bovines. RFID tags and readers have a proven track record in this country and around the globe. Currently, state animal health officials are using RFID tags. The Michigan TB eradication program which we are actively involved in is a great working example. Additionally, we encourage the adoption of half duplex tag technology due to its higher level of accuracy when compared to full duplex technology.

It is our firm belief that a national mandatory program will be received best if it is a public/private partnership. Our FAIR system has rules for access for our online system that meets the needs of producers and state animal health officials.

We are working with private industry in developing traceable meat supplies. We have been fortunate to be on the cutting edge of tracking cattle from birth to slaughter, and now we are working with the world's largest restaurant chain to do the same.

In general, we are pleased with the NAIS; however, we feel the time line must be accelerated. A resolution that came from our delegate body at our 120<sup>th</sup> Annual Meeting in Portland, Maine earlier this week is attached. Please contact us if you have questions or need additional information about our comments.

Cordially,

John M. Meyer  
Chief Executive Officer  
Attachment

HOLSTEIN ASSOCIATION USA, INC.  
RESOLUTION #2

WHEREAS public/private partnerships in the field of animal identification provide benefits of confidentiality of records, cost controls, and efficiency of administration, to all cattle producers and the general public, and

WHEREAS proof of the success of these types of partnerships can be seen from the partnership of USDA-APHIS with the Holstein Association USA, Inc. which created the National Farm Animal Identification and Records (FAIR) Program,

THEREFORE BE IT RESOLVED THAT THE DELEGATES OF THE 120<sup>TH</sup> ANNUAL MEETING OF HOLSTEIN ASSOCIATION USA, INC., WHO REPRESENT 25,000 MEMBER/PRODUCERS FROM ACROSS THE UNITED STATES,

- I. Support USDA-APHIS's decision to make the National Animal Identification System (NAIS) mandatory,
- II. Support the decision of the Cattle Species Group (the Advisory Group formed pursuant to the USAIP Plan) to recommend use of Radio Frequency Identification Device (RFID) button tag technology for cattle identification, and
- III. Recommend the use of the half duplex RFID button ear tag for improved identification accuracy which allows enhanced tracking of animals from birth to food plate.
- IV. Overall we are pleased with the NAIS plan but believe that the time line must be accelerated.

Submitted by the Holstein Association USA, Inc. Board of Directors.

Resolution Passed by Annual Meeting Delegates  
Holstein Association USA, Inc.  
Portland, Maine  
June 28, 2005